

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

In re:

Case No. 6:14-bk-005576-CCJ

WILLIAM ROGER PARSONS
KAREN LEE PARSONS
aka CARRIE LEE PARSONS

Debtors.

Eloise K. Hahn, Trustee
Eloise K. Hahn Living Trust
dba Burke Financial LLC
Member of Win Par Hospitality Laredo LLC

Adv No: 6:14-ap-00032-KSJ

Plaintiff,

vs.

William Roger Parsons
dba General Partner of Win Par Hospitality LLLP
Tax Managing Member and President of Win Par Hospitality Laredo LLC

EIN: 20-3467186

Defendant.

FILED VIA MAIL

JUN 30 2014

CLERK U.S. BANKRUPTCY,
ORLANDO DIVISION

NOTICE OF PLEADING

Eloise K. Hahn, Plaintiff, has filed a pleading Rule to Show Cause with this court seeking a judgment against defendant for his willful failure in violating Federal codes of procedure under the bankruptcy code in willfully not mailing plaintiff a copy of his response and amended response, including his motion to dismiss adversary

proceeding filed by plaintiff. It is plaintiff's understanding that defendant filed his amended response with this court on June 17, 2014, 8 days ago. To date, plaintiff has not received defendant's pleadings. Had plaintiff received his response plaintiff would object to his motion to dismiss the adversary proceeding due to FRAUD pursuant to Section 523(a). Plaintiff has filed an amended adversary proceeding complaint based on the discovery she completed from the exhibits she filed on June 5, 2014. Plaintiff requests leave of court to file additional documents to further demonstrate that fraud has occurred with respect to Hahn's capital of \$250,000 which apparently is due and owing to her since May of 2007.

Plaintiff is scheduled for trial in the Richmond bankruptcy court with respect to Thomas A. Minor on September 15, 2014, with respect to FRAUD and violations of Section 523(a). Hahn plans to retain local counsel both in Virginia and Florida for the adversary trial proceedings if she is granted to do so by this honorable court.

Plaintiff plans to attend the preliminary hearing on July 21, 2014, at 10:15 a.m. in courtroom 6A, 6th floor, George C. Young Courthouse, West Washington Street, Orlando, FL 32801.

Date: June 25,, 2014

Eloise K. Hahn
Eloise K. Hahn, Trustee
Eloise K. Hahn Living Trust
313 East 1300 North
Chesterton, IN 46304
(219) 617-5496, cell

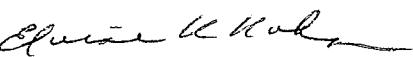
(219) 413-2353
eloisehahn349@gmail.com

CERTIFICATE OF SERVICE

I, Eloise K. Hahn, hereby certify that a true and correct copy of the foregoing notice of pleading was mailed to the following parties via USPS mail, being:

George C. Young Courthouse
U.S. Bankruptcy Court
Clerk of the Court
Attn: Mary Henry, Case Assignee
400 West Washington Street
Suite 5100
Orlando, FL 32801

William R. Parsons
152 Martesia Way
Indian Harbor Beach, FL 32937



Date: June 25, 2014

Eloise K. Hahn

I, Eloise K. Hahn, hereby certify that a true and correct copy of the foregoing notice of pleading was mailed to the following party via USPS mail, being:

Laurie K. Weatherford
Post Office Box 3450
Winter Park, FL 32790



Date: June 25, 2014

Eloise K. Hahn

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

In re:

William Roger Parsons
152 Martesia Way
Indian Harbor Beach, FL 32937

Case No. 6:14-bk-00557-CCJ
Chapter 13

Karen Lee Parsons
aka Carrie Lee Parsons
152 Martesia Way
Indian Harbor Beach, FL 32937

Debtors.

Eloise K. Hahn, Trustee of Eloise K. Hahn Living Trust and Successors
dba Managing Member of Burke Financial LLC
Member of Win Par Hospitality Laredo LLC

Plaintiff,

vs.

Adv. Pro. No. 6:14-ap-00032-KSJ

William Roger Parsons
dba General Partner of Win Par Hospitality LLLP
Managing Member of Win Par Hospitality Laredo LLC
3550 N. Atlantic Av
Cocoa Beach, FL 32931

EIN: 20-3467186

Defendant.

RULE TO SHOW CAUSE

NOW COMES the plaintiff, Eloise K. Hahn, Trustee of the Eloise K. Hahn
Living Trust, dba Burke Financial LLC and Member of Win Par Hospitality Laredo
LLC and for her cause of action states to wit:

1. That the defendant, William R. Parsons, filed a response to

plaintiff's adversary proceeding complaint with this court and failed to mail a copy of the response to plaintiff.

2. That the defendant, William R. Parsons, filed an amended response to the adversary proceeding complaint on June 17, 2014, being a Motion to Dismiss the Adversary Proceeding. Plaintiff did not receive a copy of the amended response as of June 25, 2014, 8 days since he filed the amended response.

3. That the defendant has violated rules of Federal bankruptcy procedure in that he has continually failed in mailing the plaintiff a copy of his responses, motions, and pleadings. He has done so willfully.

4. That the plaintiff cannot fully prepare a response to strike the defendant's motion to dismiss without receiving a copy of the pleading, however, plaintiff objects to dismissal of the adversary proceeding due to FRAUD pursuant to Section 523(a).

5. That plaintiff has been ordered to appear at trial in the Richmond bankruptcy court on September 15, 2014, in order that the court be allowed to determine if FRAUD had occurred pursuant to Section 523(a) with respect to Thomas A. Minor.

6. That plaintiff needs to enter additional evidence within the next several weeks with respect to her former attorney's file regarding this matter.

7. That plaintiff needs to retain local counsel in Florida for an evidentiary hearing once all exhibits have been filed.

WHEREFORE, plaintiff requests this honorable court to order defendant

to mail a copy of his response and amended response, including motion to dismiss so that the plaintiff is able to amend her motion to strike defendant's motion to dismiss plaintiff's adversary proceeding. Further, plaintiff requests why defendant should not be held in contempt of court for not providing plaintiff copies of his responses pursuant to Federal rules and procedures of the bankruptcy code.

Respectfully submitted,



Eloise K. Hahn , Trustee
Eloise K. Hahn Living Trust
dba Burke Financial LLC
Member of Win Par Hos[pitality Laredo LLC

CERTIFICATE OF SERVICE

I, Eloise K. Hahn, do hereby certify that I mailed a copy of the foregoing pleading to the following parties via UPS mail on June 25, 2014, being:

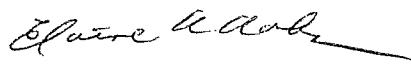
Lee Ann Bennett, Clerk of the Court
Attn; Mary Henry, Case Assignee
George C. Young Federal Courthouse
400 West Washington Street
Suite 5100
Orlando, FL 32801

WILLIAM R. Parsons
152 Martesia Way
Indian Harbor Beach, FL 32937

U.S. Trustee
Department of Justice
George C. Young Federal Courthouse
400 West Washington Street
Suite
Orlando, FL 32801

Laurie Weatherford, Trustee

P.O. Box 3450
Winter Park, FL 32790-3450



June 25, 2014

Eloise K. Hahn